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21 *Attorneys for Defendants C. R. Bard, Inc. and*  
22 *Bard Peripheral Vascular, Inc.*

23 IN THE UNITED STATES DISTRICT COURT

24 FOR THE DISTRICT OF ARIZONA

25  
26 IN RE: Bard IVC Filters Products Liability  
Litigation,

27 No. 2:15-MD-02641-DGC

28  
**THE PARTIES' JOINT  
SUBMISSION REGARDING  
PRIVILEGE LOG ISSUES**

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2  
3  
**PURSUANT TO CASE  
MANAGEMENT ORDER NO. 10**

4        In accordance with Case Management Order no. 10 [Doc. 1319], the Parties are  
5 continuing the meet and confer process. Plaintiffs are in the process of categorizing the  
6 privilege log entries that they are challenging at this time. Bard is currently reviewing the  
7 challenges provided by Plaintiffs. The parties have agreed to a meet and confer process  
8 on a log by log basis, while at the same time addressing similar documents as a group to  
9 resolve as many of the challenges as expediently as possible.  
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12        Before the parties can fully answer the Court's inquiry in CMO No. 10 regarding  
13 the challenges that can be resolved and the number of documents that remain in dispute,  
14 the parties need guidance from the Court as to which law applies and the scope of that  
15 application. The parties have briefed this fully [Doc # 1214, Doc # 1476, and Doc  
16 #1590.] Direction from the Court through resolution of the parties' briefing on privilege  
17 issues will hopefully allow for substantial resolution of privilege log entry challenges. In  
18 the interim and pursuant to the Court's instruction in CMO No. 10, the parties are  
19 proceeding with categorizing Plaintiffs' challenges and meeting and conferring on those  
20 groupings to narrow the scope and number of Plaintiffs' challenges.  
21  
22

23  
24  
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26        *(Signatures on Following Page)*  
27  
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1 DATED this 27<sup>th</sup> day of May 2016.  
2  
3

4 GALLAGHER & KENNEDY, P.A.

5 SNELL & WILMER L.L.P.

6 By: /s/ Robert W. Boatman

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21 Attorneys for C. R. Bard, Inc. and Bard  
22 Peripheral Vascular, Inc.

23 **CERTIFICATE OF SERVICE**

24 I hereby certify that May 27, 2016, the foregoing was electronically filed with the  
25 Clerk of Court using the CM/ECF system which will automatically send email notification  
26 of such filing to all attorneys of record.

27 /s/ Richard B. North, Jr.

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